

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Mid-States Rubber Products, Inc.
1230 Race Street
Princeton, Indiana 47670**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 051-7807-00021	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary rubber extrusion and molding source.

Responsible Official:	Dave McKinney
Source Address:	1230 Race Street, Princeton, Indiana 47670
Mailing Address:	1230 Race Street, P.O. Box 307, Princeton, Indiana 47670
Phone Number:	(812) 385-3473
SIC Code:	3061
County Location:	Gibson
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) conveyORIZED degreaser, identified as U-05, constructed in 1968 and rebuilt in 1973, with a maximum capacity of 360 cubic feet, and exhausting to stack S-04.
- (b) One (1) natural gas-fired steam generating boiler, identified as U-04, using No. 2 and No. 5 fuel oil as backup fuels, constructed in November 1989, capacity: 14.7 million British thermal units per hour.
- (c) One (1) natural gas-fired steam generating boiler, identified as U-03, using No. 2 and No. 5 fuel oil as backup fuels, constructed in 1956, capacity: 8.4 million British thermal units per hour.
- (d) One (1) mixing process for manufacturing molded and extruded rubber parts, with a weighing area, identified as U-01 and a Banbury mixer, identified as U-02, equipped with a dust collector, constructed in 1979, and exhausting to stack S-01, capacity: 530 pounds of rubber produced per batch, 10 batches per hour.
- (e) Two (2) surface coating stations, identified as U-06 and U-07, constructed in 1965, consisting of dip coating and spray coating operations using air atomization spray guns, and equipped with dry filters for overspray control, capacity: 2.5 gallons of coatings per hour or 600 units per hour.
- (f) Molding/curing hot press, identified as U-08, constructed between 1956 and 1993, equipped with seventy-two (72) steam presses rated at 0.11 million British thermal units per hour per press and twenty-four (24) injection presses rated at 23.4 kilowatt hours per press, capacity: 4,000 pounds of rubber per hour, total.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (b) One (1) extruding area, identified as U-07, for extruding the batch rubber from the mixing area into long strands. [326 IAC 6-3-2]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B **GENERAL CONDITIONS**

B.1 Permit No Defense [IC 13]

-
- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

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- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

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- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

- (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408 (a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)]
[326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
 - (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-1.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).
- (2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (i) A brief description of the change within the source;
 - (ii) The date on which the change will occur;
 - (iii) Any change in emissions; and
 - (iv) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Construction Permit Requirement [326 IAC 2]

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

B.23 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Stack Height [326 IAC 1-7]
The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM, may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) conveyorized degreaser, identified as U-05, constructed in 1968 and rebuilt in 1973, with a maximum capacity of 360 cubic feet, and exhausting to stack S-04.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart T.

D.1.2 Halogenated Solvent Cleaning Machine NESHAP [40 CFR Part 63, Subpart T] [326 IAC 20-6-1]

This facility is subject to 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning Machine NESHAP), which is incorporated by reference as 326 IAC 20-6-1. A copy of the rule is attached.

- (a) That pursuant to 40 CFR 63.463(a) & (c), the Permittee shall conform to the following design requirements:
- (1) The cleaning machine shall be designed or operated such that, it has an idling and downtime mode cover, as described in 40 CFR 63.463(d)(1)(i), that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects.
 - (2) The cleaning machine shall be employed with a control combination of freeboard refrigeration device and freeboard ratio of 1.0 or other equivalent methods of control as determined using the procedure in 40 CFR 63.469).
 - (3) Cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minutes (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.
 - (4) Cleaning machine shall be equipped with a device that shuts off sump heat if the sump liquid solvent level drops to the sump heater coils.
 - (5) Cleaning machine shall have a primary condenser.
 - (6) Cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
- (b) That pursuant to 40 CFR 63.463 (d), the following work and operational practice requirements for the degreasing operation are applicable:

- (1) Control air disturbances across the cleaning machine opening(s) by placing cover(s) to the solvent cleaning machine during the idling mode and the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place.
 - (2) Any spraying operations shall be done within the vapor zone or within the section of the solvent cleaning machine that is not directly exposed to the ambient air.
 - (3) Parts shall be oriented so that the solvents drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine unless an equally effective approach has been approved by the commissioner.
 - (4) Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped.
 - (5) During startup of each vapor cleaning machine, the primary condenser shall be turned on before the sump heater.
 - (6) During shutdown of each vapor cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
 - (7) When solvent is added or drained from any solvent cleaning machine, the solvent shall be transferred using threaded or other leak proof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
 - (8) Each solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the commissioner's satisfaction to achieve the same or better results as those recommended by the manufacturer.
 - (9) Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in appendix B to 40 CFR 63, if requested during an inspection by the commissioner.
 - (10) Waste solvents, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container.
 - (11) Sponges, fabric, wood, and paper products shall not be cleaned.
- (c) That pursuant to 40 CFR 63.463 (e), the Permittee shall comply with the following requirements:
- (1) The Permittee shall conduct monitoring of each control device used to comply with §63.463 as provided in 40 CFR 63.466, monitoring procedures (Compliance Monitoring Requirements).

- (2) Determine during each monitoring period if the control device used to comply with the requirements of 40 CFR 63. 463 meets the following requirements:
 - (A) the Permittee shall ensure that the chilled air blanket temperature (in EF), measured at the center of the air blanket of the freeboard refrigeration device is no greater than 30% of the solvent's boiling point.
 - (B) When using an idling-mode cover the Permittee shall:
 - (i) ensure that the cover is in place whenever parts are not in the solvent cleaning machine and completely covers the cleaning machine openings when in place.
 - (ii) ensure that the idling-mode cover is maintained free of cracks, holes, and other defects.
- (3) An exceedance has occurred if :
 - (A) the requirements of paragraph (c)(2)(B)(ii) of this condition are not met; and
 - (B) the requirements of paragraphs (c)(2)(A) and (c)(2)(B)(i) of this condition have not been met and are not corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameters must be remeasured immediately upon adjustment or repair and demonstrated to be within the required limits.
- (4) The owner or operator shall report all exceedances and all corrections and adjustments made to avoid an exceedance as specified in 40 CFR 63.468.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.1.4 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit or by 40 CFR Part 63; 40 CFR 63.465 Test Methods. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 Monitoring Procedures [326 IAC 2-7-6(1)] [40 CFR 63.466] [326 IAC 20-6-1]

That pursuant to 40 CFR 63.466, the Permittee shall comply with the following monitoring procedures:

- (a) The Permittee shall conduct monitoring and record the results on a weekly basis for the control devices, as appropriate, specified in paragraph below:

The Permittee shall use a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode.

- (b) The Permittee shall conduct monitoring and record the results on a monthly basis for the control devices, as appropriate, specified in paragraph below:

The Permittee shall conduct a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects.

- (c) The Permittee shall monitor the hoist speed as described below:
- (1) The Permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes.
 - (2) The monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the Permittee may begin monitoring the hoist speed quarterly.
 - (3) If the exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to the monthly until another year of compliance without an exceedance is demonstrated.
 - (4) If the Permittee can demonstrate to the commissioner's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.

Recordkeeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

D.1.6 Record keeping Requirements

-
- (a) The Permittee shall maintain, in written or electronic form, records of the following information specified below for the life time of the machine:
- (1) Owners's manuals, or if not available, written maintenance and operating procedures, for the solvent cleaning machine and control equipment.
 - (2) The date of installation of the solvent cleaning machine and all of its control devices. If the exact date of the installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.
 - (3) Records of the halogenated HAP solvent content for each solvent used in a solvent cleaning machine.
- (b) The Permittee shall maintain, in written or electronic form, records of the following information specified below for a period of 5 years:
- (1) The results of control device monitoring required under 40 CFR 63.466.
 - (2) Information on the actions taken to comply with 40 CFR 63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.

- (3) Estimates of annual solvent consumption for each solvent cleaning machine.

D.1.7 Reporting Requirements

- (a) A summary of the information to document compliance with Conditions D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, and to the following address:
- United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
- (b) The Permittee shall submit an annual report by February 1 of each year following the one for which the reporting is being made. This report shall include the requirements as follows:
- (1) A signed statement from the facility owner or his designee stating that , "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in 40 CFR 63.463(d)(10)."
- (2) An estimate of solvent consumption for each solvent cleaning machine during the reporting period.
- (c) The Permittee shall submit an exceedance report to the commissioner semiannually except when, the commissioner determines that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the Permittee shall follow a quarterly reporting format until a request to reduce reporting frequency under paragraph 40 CFR 63.463 (i) of this section is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information as given below:
- (1) Information on the actions taken to comply with 40 CFR 63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
- (2) If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
- (3) If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.
- (d) That pursuant to 40 CFR 63.463 (i), the Permittee who is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semi-annual if the following conditions are met:
- (1) The source has determined a full year of compliance without an exceedance.

- (2) The Permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in Subpart A (General Provisions) and in 40 CFR 63, Subpart T.
 - (3) The commissioner does not object to a reduced frequency of reporting for the affected source as provided in paragraphs (e)(3)(iii) of Subpart A (General Provisions) of 40 CFR 63.
- (e) The Permittee of a solvent cleaning machine requesting an equivalency determination, as described in 40 CFR 63.469 shall submit an equivalency request report to the commissioner and receive an approval prior to startup.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (b) One (1) natural gas-fired steam generating boiler, identified as U-04, using No. 2 and No. 5 fuel oil as backup fuels, constructed in November 1989, capacity: 14.7 million British thermal units per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the 14.7 million British thermal unit per hour heat input boiler shall be limited to 0.48 pound per million British thermal unit heat input.

This limitation is based on the following equation:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

D.2.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 12-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

- (a) The SO₂ emissions from the fourteen and seven-tenths (14.7) million British thermal unit per hour gas and oil-fueled boiler shall not exceed five tenths (0.5) pounds per million British thermal units heat input; or
- (b) The sulfur content of the fuel No. 2 fuel oil shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]
- (c) The sulfur content of the fuel No. 5 fuel oil shall not exceed forty-five-hundredths percent (0.45%) by weight. [40 CFR 60.42c(d)]

Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.2.4 Sulfur Dioxide Emissions and Sulfur Content

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance utilizing one of the following options:

- (a) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
- (b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Visible Emissions Notations

- (a) Visible emission notations of the boiler stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere and operating on fuel oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.6 Record Keeping Requirements

- (a) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.
 - (1) Calendar dates covered in the compliance determination period;

- (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
- (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records of visible emission notations of the boiler stack exhaust once per shift.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 in any compliance period when No. 2 or No. 5 fuel oil was combusted, and the natural gas fired boiler certification, shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (c) One (1) natural gas-fired steam generating boiler, identified as U-03, using No. 2 and No. 5 fuel oil as backup fuels, constructed in 1956, capacity: 8.4 million British thermal units per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(d) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from all facilities used for indirect heating purposes which were existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 pounds of particulate matter per million British thermal units heat input.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.2 Record Keeping Requirements

The natural gas fired boiler certification, shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (d) One (1) mixing process for manufacturing molded and extruded rubber parts, with a weighing area, identified as U-01 and a Banbury mixer, identified as U-02, equipped with a dust collector, constructed in 1979, and exhausting to stack S-01, capacity: 530 pounds of rubber produced per batch, 10 batches per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the mixing process shall not exceed 7.88 pounds per hour when operating at a process weight rate of 5,300 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.4.2 Particulate Matter (PM)

The dust collector for PM control shall be in operation and control emissions from the mixer and weighing area at all times that the mixer and weighing area are in operation.

SECTION D.5

FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (e) Two (2) surface coating stations, identified as U-06 and U-07, constructed in 1965, consisting of dip coating and spray coating operations using air atomization spray guns, and equipped with dry filters for overspray control, capacity: 2.5 gallons of coatings per hour or 600 units per hour.
- (f) Molding/curing hot press, identified as U-08, constructed between 1956 and 1993, equipped with seventy-two (72) steam presses rated at 0.11 million British thermal units per hour per press and twenty-four (24) injection presses rated at 23.4 kilowatt hours per press, capacity: 4,000 pounds of rubber per hour, total.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the PM from the two (2) surface coating stations (U-06 and U-07) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.5.3 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the two (2) surface coating stations (U-06 and U-07) are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.4 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.5 Record Keeping Requirements

- (a) To document compliance with Conditions D.5.3 and D.5.4, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.6

FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - Insignificant Activities

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (b) One (1) extruding area, identified as U-07, for extruding the batch rubber from the mixing area into long strands. [326 IAC 6-3-2]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Particulate Matter (PM) [326 IAC 6-3]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the extruding area shall not exceed 7.88 pounds per hour when operating at a process weight rate of 5,300 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the insignificant brazing equipment, cutting torches, soldering equipment, and welding equipment shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Mid-States Rubber Products, Inc.
Source Address: 1230 Race Street, Princeton, Indiana 47670
Mailing Address: 1230 Race Street, P.O. Box 370, Princeton, Indiana 47670
Part 70 Permit No.: T 051-7807-00021

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Mid-States Rubber Products, Inc.
Source Address: 1230 Race Street, Princeton, Indiana 47670
Mailing Address: 1230 Race Street, P.O. Box 370, Princeton, Indiana 47670
Part 70 Permit No.: T 051-7807-00021

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9	1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C) C The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Mid-States Rubber Products, Inc.
Source Address: 1230 Race Street, Princeton, Indiana 47670
Mailing Address: 1230 Race Street, P.O. Box 370, Princeton, Indiana 47670
Part 70 Permit No.: T 051-7807-00021

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel

From

To

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Mid-States Rubber Products, Inc.
Source Address: 1230 Race Street, Princeton, Indiana 47670
Mailing Address: 1230 Race Street, P.O. Box 370, Princeton, Indiana 47670
Part 70 Permit No.: T 051-7807-00021

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Mid-States Rubber Products, Inc.
Source Location: 1230 Race Street, Princeton, Indiana 47670
County: Gibson
SIC Code: 3061
Operation Permit No.: T 051-7807-00021
Permit Reviewer: CarrieAnn Ortolani

On June 30, 2000, the Office of Air Management (OAM) had a notice published in the Princeton Daily Clarion, Princeton, Indiana, stating that Mid-States Rubber Products, Inc. had applied for a Part 70 Operating Permit to operate a rubber extrusion and molding source with dust collectors and dry filters as controls. The notice also stated that OAM proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

Upon further review, the OAM has decided to make the following changes to the Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

Change 1:

Condition D.1.2(c)(3) referenced conditions that do not exist in this permit. Condition D.1.2(c)(3) has been corrected as follows:

(3) An exceedance has occurred if :

- (A) the requirements of paragraphs (c)(2)(B)(ii), ~~(c)(2)(C)(i), (c)(2)(D)(i), (c)(2)(E), (c)(2)(F)(ii), (c)(2)(F)(iii), (c)(2)(G)(ii), and (c)(2)(G)(iii)~~ of this condition are not met; and
- (B) the requirements of paragraphs (c)(2)(A) **and** (c)(2)(B)(i), ~~(c)(2)(C)(ii), (c)(2)(D)(ii), (c)(2)(F)(i), and (c)(2)(G)(i)~~ of this condition have not been met and are not corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameters must be remeasured immediately upon adjustment or repair and demonstrated to be within the required limits.

Change 2:

Condition D.2.1 included an incorrect boiler capacity. Condition D.2.1 has been revised as follows:

D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the ~~8-4~~ **14.7** million British thermal unit per hour heat input boiler shall be limited to 0.48 pound per million British thermal unit heat input.

This limitation is based on the following equation:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

Change 3:

The facility description (d) in Section A.2 and the facility description box in Section D.4 has been clarified as follows:

- (d) One (1) mixing process for manufacturing molded and extruded rubber parts, with a weighing area, identified as U-01 and a Banbury mixer, identified as U-02, equipped with a dust collector, constructed in 1979, and exhausting to stack S-01, capacity: 530 pounds of rubber **produced** per batch, 10 batches per hour.

Change 4:

As part of the U.S. EPA's 1997 Compliance Assurance Monitoring rule making (Federal Register Volume 62, page 54900-54947, Wednesday, October 22, 1997), the language in 40 CFR Part 70.6(c)(5)(iii)(B)) was changed from "continuous or intermittent compliance" to "based on continuous or intermittent data." The U.S. District Court of Appeals, Washington D.C. ruled against EPA's language, saying that the Clean Air Act wording of continuous or intermittent compliance had to be used (NRDC v. EPA, #97-1727). This change has been made to this permit to be consistent with state and federal law. Therefore, Condition B.11(c) is revised as follows:

- (c) The annual compliance certification report shall include the following:

- (1) The identification of each term or condition of this permit that is the basis of the certification;
- (2) The compliance status;
- (3) Whether compliance was ~~based on~~ continuous or intermittent data;
- (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	Mid-States Rubber Products, Inc.
Source Location:	1230 Race Street, Princeton, Indiana 47670
County:	Gibson
SIC Code:	3061
Operation Permit No.:	T 051-7807-00021
Permit Reviewer:	CarrieAnn Ortolani

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Mid-States Rubber Products, Inc. relating to the operation of a rubber extrusion and molding source.

Permitted Emission Units and Pollution Control Equipment

Although the molding/curing hot presses are not specifically permitted, each individual press did not require a permit due to exempt emission rates. The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) conveyorized degreaser, identified as U-05, constructed in 1968 and rebuilt in 1973, with a maximum capacity of 360 cubic feet, and exhausting to stack S-04.
- (b) One (1) natural gas-fired steam generating boiler, identified as U-04, using No. 2 and No. 5 fuel oil as backup fuels, constructed in November 1989, capacity: 14.7 million British thermal units per hour.
- (c) One (1) natural gas-fired steam generating boiler, identified as U-03, using No. 2 and No. 5 fuel oil as backup fuels, constructed in 1956, capacity: 8.4 million British thermal units per hour.
- (d) One (1) mixing process for manufacturing molded and extruded rubber parts, with a weighing area, identified as U-01 and a Banbury mixer, identified as U-02, equipped with a dust collector, constructed in 1979, and exhausting to stack S-01, capacity: 530 pounds of rubber per batch, 10 batches per hour.
- (e) Two (2) surface coating stations, identified as U-06 and U-07, constructed in 1965, consisting of dip coating and spray coating operations using air atomization spray guns, and equipped with dry filters for overspray control, capacity: 2.5 gallons of coatings per hour or 600 units per hour.
- (f) Molding/curing hot press, identified as U-08, constructed between 1956 and 1993, equipped with seventy-two (72) steam presses rated at 0.11 million British thermal units per hour per press and twenty-four (24) injection presses rated at 23.4 kilowatt hours per press, capacity: 4,000 pounds of rubber per hour, total.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (b) One (1) extruding area, identified as U-07, for extruding the batch rubber from the mixing area into long strands. [326 IAC 6-3-2]
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
 - (1) There is one natural gas-fired boiler that is insignificant. Because that boiler is not insignificant when operating on No. 2 or No.5 fuel oil (backup fuels), the boiler is listed as a significant emission unit.
 - (2) One (1) drying oven.
 - (3) Space heaters.
- (d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (e) The following VOC and HAP storage containers: vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (f) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (g) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.
- (h) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (i) Paved and unpaved roads and parking lots with public access.

- (j) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (k) On-site fire and emergency response training approved by the department.
- (l) Emergency generators as follows: diesel generators not exceeding 1,600 horsepower.
- (m) Purge double block and bleed valves.
- (n) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kiloPascals measured at 38EC.
- (o) A laboratory as defined in 326 IAC 2-7-1(21)(D).

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) OP 26-03-92-0124, issued on January 25, 1989;
- (b) OP 26-03-92-0125, issued on January 25, 1989;
- (c) OP 26-03-92-0126, issued on January 25, 1989; and
- (d) OP 26-03-87-0103, issued on September 27, 1983.

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively incomplete Part 70 permit application for the purposes of this review was received on December 16, 1996. Additional information received on February 25, 1997 made the Part 70 permit application administratively complete. Additional information was received on January 7, January 10 and May 24, 2000.

A notice of completeness letter was mailed to the source on March 6, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Pages 1 through 10 of 10).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	43.1
PM ₁₀	37.1
SO ₂	57.2
VOC	432
CO	8.5
NO _x	40.1

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Tetrachloroethylene	178
Arsenic	0.002
Beryllium	0.002
Cadmium	0.002
Chromium	0.003
Lead	3.58
Mercury	0.002
Manganese	0.003
Nickel	0.003
Selenium	0.008
Benzene	0.036
Dichlorobenzene	0.00008
Formaldehyde	0.027

HAPs	Potential To Emit (tons/year)
Hexane	0.916
Toluene	160
Xylene	135
Ethylbenzene	27.5
MDI	1.74
MEK	38.1
MIBK	6.54
Epichlorohydrin	0.342
1,1,1 Trichloroethane	0.082
1,1 Dichloroethane	0.039
1,3 Butadiene	0.391
1,4 Dichlorobenzene	0.002
2-Butanone	0.275
2-Chloro-1,3-Butadiene	0.159
Acetaldehyde	0.070
Acetophenone	0.075
Acrylonitrile	0.801
Aniline	0.085
Benzidine	0.005
bis(2-Ethylhexyl)phthalate	0.217
Carbon Disulfide	25.5
Carbonyl Sulfide	8.21
Chloroform	0.007
Chloromethane	0.144
Cumene	0.053
Di-n-butylphthalate	0.105
Dibenzofuran	0.001
Dimethylphthalate	0.002
Isooctane	0.102
Isophorone	0.016

HAPs	Potential To Emit (tons/year)
Methylene Chloride	0.375
Naphthalene	0.054
o-Toluidine	0.028
Phenol	0.063
Propylene Oxide	1.98
Styrene	0.056
t-Butyl Methyl Ether	2.92
2-Chloroacetophenone	0.00001
Biphenyl	0.0002
Acrolein	0.019
Hexachloroethane	0.0001
Nitrobenzene	0.001
TOTAL	367

- (a) The potentials to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1998 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	1.20
PM ₁₀	1.44
SO ₂	0.016
VOC	24.1
CO	0.921
NO _x	3.69
HAP	not reported

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 Operating Permit.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Conveyorized Degreaser (U-05)	0.00	0.00	0.00	176	0.00	0.00	176
Boiler (U-04)	4.63	0.920	32.7	0.523	5.41	25.5	0.078
Boiler (U-03)	2.65	0.526	20.8	0.299	3.09	14.6	0.045
Mixing Process (U-02)	13.1	13.1	0.00	6.76	0.00	0.00	4.64
Surface Coating (U-06 and U-07) and molding/curing hot presses (U-08)	2.25	2.25	0.00	245	0.00	0.00	185
Insignificant Activities	1.00	1.00	1.00	5.00	5.00	5.00	5.00
Total Emissions	23.6	17.8	53.5	434	13.5	45.1	371

County Attainment Status

The source is located in Gibson County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Gibson County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Gibson County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) The one (1) natural gas-fired steam generating boiler, identified as U-04, using No. 2 and No. 5 fuel oil as backup fuel, constructed in 1989 and having a maximum heat input capacity of 14.7 million British thermal units per hour, is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) because it was installed after the June 9, 1989 applicability date and is rated between 10 and 100 million British thermal units per hour. When the boiler operates on natural gas, there are no applicable standards under 40 CFR 60.42c. When the boiler operates on fuel oil, the boiler must comply with the applicable standards in 40 CFR 60.42c. Pursuant to 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) the SO₂ emissions from the boiler shall not exceed five tenths (0.5) pounds per million Btu heat input; or the sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight. Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction. Attached is a copy of the federal rule.

- (b) The one (1) natural gas-fired steam generating boiler, identified as U-03, using No. 2 and No. 5 fuel oil as backup fuel, constructed in 1956 and having a maximum heat input capacity of 8.4 million British thermal units per hour, is not subject to the New Source Performance Standards, 326 IAC 12, 40 CFR 60.40, 40 CFR 60.40a, 40 CFR 60.40b and 40 CFR 60.40c, Subparts D, Da, Db and Dc because it was installed prior to September 18, 1978 and has a capacity less than 250 million British thermal units per hour.
- (c) The conveyorized degreaser is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63.460, Subpart T). Attached is a copy of the federal rule.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart T.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The potential to emit of VOC after controls is greater than 250 tons per year. Therefore, this source is a major source pursuant to 326 IAC 2-2, Prevention of Significant Deterioration (PSD). Since construction of this source commenced prior to August 7, 1977, a PSD permit was not required. All modifications to this source on and after August 7, 1977 were minor modifications to an existing major source.

326 IAC 2-4.1-1 (New Source Toxics Control)

Since construction of each facility at this source commenced prior to July 27, 1997, the requirements of 326 IAC 2-4.1-1 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-2-3 (Particulate Emissions Limitations for Facilities Constructed prior to September 21, 1983)

The one (1) boiler, identified as U-03, constructed in 1956, with a heat input capacity of 8.4 million British thermal units per hour, must comply with the PM emission limitation of 326 IAC 6-2-3. This limitation is based on the following equation is given in 326 IAC 6-2-3:

$$Pt = C \times a \times h / 76.5 \times Q^{0.75} \times N^{0.25}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 mmBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 mmBtu/hr heat input.

h = Stack height in feet.

For the one (1) boiler:

$$Pt = 50 \times 0.67 \times 31 / 76.5 \times (8.4)^{0.75} \times 1^{0.25} = 2.75 \text{ lb/MMBtu}$$

Pursuant to 326 IAC 6-2-3(d), for facilities in operation on or before June 8, 1972, Pt shall not exceed 0.8 pound per million British thermal units heat input. Therefore, the one (1) boiler is limited to emissions of 0.8 pound per million British thermal units.

Based on Appendix A, the potential to emit PM emissions from the one (1) boiler limited to 0.8 pound PM per million British thermal units is highest when operating on No. 5 fuel oil and is:

$$2.6 \text{ tons/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.59 \text{ lbs/hr}$$

$$(0.59 \text{ lbs/hr} / 8.4 \text{ MMBtu/hr}) = 0.07 \text{ lbs PM per MMBtu}$$

Therefore, the one (1) boiler identified as U-03 will comply with this rule.

326 IAC 6-2-4 (Particulate Emissions Limitations for Facilities Constructed after September 21, 1983)

The one (1) boiler, identified as U-04, constructed after September 21, 1983, must comply with the requirements of 326 IAC 6-2-4. The emission limitations are based on the following equation is given in 326 IAC 6-2-4:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

The heat input capacities of the boiler is 14.7 million British thermal units per hour. There was one (1) boiler rated at 8.4 million British thermal units per hour in operation when this boiler was constructed.

$$Pt = 1.09/(23.1)^{0.26} = 0.48 \text{ lb/MMBtu heat input}$$

Based on Appendix A, the maximum potential PM emission rate occurs when operating on No. 5 fuel oil and is:

$$4.6 \text{ tons/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 1.05 \text{ lbs/hr}$$

$$(1.05 \text{ lbs/hr} / 14.7 \text{ MMBtu/hr}) = 0.071 \text{ lb PM per MMBtu}$$

Therefore, the boiler, U-04, constructed in 1989, will comply with this rule.

326 IAC 6-3-2 (Process Operations)

- (a) The PM from the mixing process, including weighing, shall not exceed 7.88 pounds per hour when operating at a process weight rate of 5,300 pounds per hour. Since the potential to emit PM is 3.00 pounds per hour, the mixing process will comply with this rule. Since the emission factors used to calculate PM emissions from this process are draft emission factors, the dust collector must be in operation at all times in order to ensure mixing process compliance with this rule. Therefore, no emission testing will be required at this time. This limitation is based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (b) The PM from the insignificant extruding operations shall not exceed 7.88 pounds per hour when operating at a process weight rate of 5,300 pounds per hour. Since the potential to emit PM is 0.0004 pound per hour, the extruding operations will comply with this rule. This limitation is based on the equation in (a).
- (c) The particulate matter (PM) from the surface coating operations shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

The dry filters shall be in operation at all times the surface coating is in operation, in order to comply with this limit.

- (d) The PM from the following insignificant equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

326 IAC 7 (Sulfur Dioxide Emission Limitations)

- (a) The potential to emit SO₂ from the one (1) boiler, U-03, which can operate on natural gas, No. 2 fuel oil, and No. 5 fuel oil, is less than 25 tons per year. Therefore, the requirements of 326 IAC 7, Sulfur Dioxide Emission Limitations, are not applicable.
- (b) Since the potential to emit SO₂ from the one (1) boiler, U-04, which can operate on No. 2 and No. 5 fuel oil, can be greater than 25 tons per year, the requirements of 326 IAC 7 are applicable to that boiler. The sulfur dioxide emissions from the boiler shall be limited to five-tenths (0.5) pounds per million British thermal units. The boiler will be in compliance with this rule when the weight percent sulfur is less than or equal to five-tenths (0.5), when operating on No. 2 fuel oil. The boiler will be in compliance with this rule when the weight percent sulfur is less than or equal to forty-five-hundredths (0.45), when operating on No. 5 fuel oil. This is calculated as follows:

For No. 2 fuel oil:

$$\begin{aligned} &919.8 \text{ kgal per year} \times (142.0 \times 0.5) \text{ pounds of SO}_2 \text{ per kgal} = 32.7 \text{ tons SO}_2 \text{ per year} \\ &32.7 \text{ tons SO}_2 \text{ per year} \times (2,000 \text{ lbs/ton} / 8,760 \text{ hrs/yr}) = 7.47 \text{ lbs/hr} \\ &7.47 \text{ lbs/hr} / 14.7 \text{ MMBtu/hr} = 0.5 \text{ lb SO}_2 / \text{million British thermal units} \end{aligned}$$

For No. 5 fuel oil:

$$\begin{aligned} &926.4 \text{ kgal per year} \times (159.0 \times 0.45) \text{ pounds of SO}_2 \text{ per kgal} = 32.7 \text{ tons SO}_2 \text{ per year} \\ &32.7 \text{ tons SO}_2 \text{ per year} \times (2,000 \text{ lbs/ton} / 8,760 \text{ hrs/yr}) = 7.47 \text{ lbs/hr} \\ &7.47 \text{ lbs/hr} / 14.7 \text{ MMBtu/hr} = 0.5 \text{ lb SO}_2 / \text{million British thermal units} \end{aligned}$$

326 IAC 8-1-6 (New facilities; General reduction requirements)

- (a) Since the degreaser and the surface coating operations were constructed prior to January 1, 1980, the requirements of 326 IAC 8-1-6 are not applicable.
- (b) Although some of the molding/curing hot presses were constructed after January 1, 1980, the requirements of 326 IAC 8-1-6 are not applicable because each press is an individual facility and the potential VOC emissions are less than 25 tons per year at each press.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

Since the conveyorized degreaser was constructed prior to January 1, 1980 in Gibson County, the requirements of 326 IAC 8-3 are not applicable.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Since the metal surface coating operations were constructed prior to January 1, 1980 in Gibson County, the requirements of 326 IAC 8-2-9 are not applicable.

326 IAC 8-6-1 (Organic Solvent Emission Limitations)

Since the conveyorized degreaser and surface coating operations were constructed prior to October 7, 1974 in Gibson County, the requirements of 326 IAC 8-6 are not applicable.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) The degreaser has applicable compliance monitoring conditions as specified below:
 - (1) The Permittee shall conduct monitoring and record the results on a weekly basis for the control devices, as appropriate, specified in paragraph below:

The Permittee shall use a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode.

- (2) The Permittee shall conduct monitoring and record the results on a monthly basis for the control devices, as appropriate, specified in paragraph below:

The Permittee shall conduct a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects.

- (3) The Permittee shall monitor the hoist speed as described below:

- (A) The Permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes.
- (B) The monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the Permittee may begin monitoring the hoist speed quarterly.
- (C) If the exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to the monthly until another year of compliance without an exceedance is demonstrated.
- (D) If the Permittee can demonstrate to the commissioner's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.

These monitoring conditions are necessary for the degreaser to comply with 40 CFR 63.466 and 326 IAC 2-7 (Part 70).

- (b) The one (1) 14.7 million British thermal unit per hour steam generating boiler, identified as U-04, has applicable compliance monitoring conditions as specified below:

Visible emission notations of the boiler stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere and operating on fuel oil. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary for the boiler to ensure compliance with 326 IAC 6-2-4 (Particulate Matter Limitations for Sources of Indirect Heating) and 326 IAC 2-7 (Part 70) when operating on fuel oil.

- (c) The two (2) surface coating stations have applicable compliance monitoring conditions as specified below:
- (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters must operate properly to ensure compliance with 326 IAC 6-3-2 (Process Operations) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations (Pages 1, 3, 5, 7, 8 and 10 of 10).

Conclusion

The operation of this rubber extrusion and molding source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 051-7807-00021**.

Appendix A: State Potential Emissions Calculations
VOC
From Degreasing Operations

Company Name: Mid-States Rubber Products, Inc.
Address City IN Zip: 1230 Race Street, Princeton, Indiana 47670
Part 70: 051-7807
Plt ID: 051-00021
Reviewer: CarrieAnn Ortolani
Date: December 16, 1996

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Gal of Mat (gal/day)	Potential VOC pounds per day	Potential VOC tons per year
Conveyorized Vapor Degreaser							
Tetrachloroethylene (Perchloroethylene)	13.5	99.90%	0.0%	99.9%	71.3	962	176
State Potential Emissions							
						962	176

METHODOLOGY

Potential VOC Pounds per Day = Solvent Density (lbs/gallon) * weight % volatiles * solvent consumption (gallons/day)

Potential VOC Tons per Year = Potential VOC Pounds per Day * (365 days/yr) * (1 ton/2000 lbs)

Appendix A: Emissions Calculations

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Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

Company Name: Mid-States Rubber Products, Inc.
Address City IN Zip: 1230 Race Street, Princeton, Indiana 47670
Part 70: 051-7807
Plt ID: 051-00021
Reviewer: CarrieAnn Ortolani
Date: December 16, 1996

U-04

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

14.7

128.8

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.122	0.489	0.039	6.44	0.354	5.41

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

U-03

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

8.4

73.6

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.070	0.280	0.022	3.68	0.202	3.09

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

(SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 3 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Page 3 of 10 TSD App A

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

HAPs Emissions

Company Name: Mid-States Rubber Products, Inc.
Address City IN Zip: 1230 Race Street, Princeton, Indiana 47670
Part 70: 051-7807
Plt ID: 051-00021
Reviewer: CarrieAnn Ortolani
Date: December 16, 1996

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.372E-04	7.840E-05	4.900E-03	1.176E-01	2.221E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	3.267E-05	7.187E-05	9.147E-05	2.483E-05	1.372E-04

Methodology is the same as page 2.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
Backup Fuel

Page 4 of 10 TSD App A

Company Name: Mid-States Rubber Products, Inc.
Address City IN Zip: 1230 Race Street, Princeton, Indiana 47670
Part 70: 051-7807
Plt ID: 051-00021
Reviewer: CarrieAnn Ortolani
Date: December 16, 1996

U-04

Heat Input Capacity Potential Throughput S = Weight % Sulfur
MMBtu/hr kgals/year 0.5

14.7

919.8

Emission Factor in lb/kgal	Pollutant				
	PM*	SO ₂	NO _x	VOC	CO
	2.0	71 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	0.920	32.7	9.20	0.156	2.30

U-03

Heat Input Capacity Potential Throughput S = Weight % Sulfur
MMBtu/hr kgals/year 0.5

8.4

525.6

Emission Factor in lb/kgal	Pollutant				
	PM*	SO ₂	NO _x	VOC	CO
	2.0	71 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	0.526	18.7	5.26	0.089	1.31

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 5 for HAPs emission calculations.

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
HAPs Emissions

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Company Name: Mid-States Rubber Products, Inc.
Address City IN Zip: 1230 Race Street, Princeton, Indiana 47670
Part 70: 051-7807
Plt ID: 051-00021
Reviewer: CarrieAnn Ortolani
Date: December 16, 1996

HAPs - Metals

Emission Factor in lb/mmBtu	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential Emission in tons/yr	2.16E-03	1.62E-03	1.62E-03	1.62E-03	4.87E-03

HAPs - Metals (continued)

Emission Factor in lb/mmBtu	Mercury 3.0E-06	Manganese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05
Potential Emission in tons/yr	1.62E-03	3.25E-03	1.62E-03	8.11E-03

Methodology

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#5 and #6 Fuel Oil

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Company Name: Mid-States Rubber Products, Inc.
Address City IN Zip: 1230 Race Street, Princeton, Indiana 47670
Part 70: 051-7807
Plt ID: 051-00021
Reviewer: CarrieAnn Ortolani
Date: December 16, 1996

U-04

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur
14.70	926.4	0.5

Emission Factor in lb/kgal	Pollutant					
	PM**	PM-10	SO ₂	NO _x	VOC	CO
	10	1.5	78.5	55.0	1.13	5.0
	<i>*see below</i>		<i>(157S)</i>			
Potential Emission in tons/yr	4.63	0.695	36.4	25.5	0.523	2.32

***Particulate Matter emission factor for #5 fuel oil is 10.0 lb/kgal**

***Particulate Matter emission factor for #6 fuel oil is 9.19(s) + 3.22 lb/kgal**

****PM emission factor is filterable PM only. Condensable PM emission factor is 1.5 lb/kgal.**

U-03

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur
8.40	529.4	0.5

Emission Factor in lb/kgal	Pollutant					
	PM**	PM-10	SO ₂	NO _x	VOC	CO
	10	1.5	78.5	55.0	1.13	5.0
	<i>*see below</i>		<i>(157S)</i>			
Potential Emission in tons/yr	2.65	0.397	20.8	14.6	0.299	1.32

***Particulate Matter emission factor for #5 fuel oil is 10.0 lb/kgal**

***Particulate Matter emission factor for #6 fuel oil is 9.19(s) + 3.22 lb/kgal**

****PM emission factor is filterable PM only. Condensable PM emission factor is 1.5 lb/kgal.**

1 gallon of #5 Fuel oil has a heating value of 139,000 Btu

1 gallon of #6 Fuel oil has a heating value of 150,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 kgal per 1000 gallon x 1 gal per 0.139 MMBtu

Emission Factors are from AP 42 Tables 1.3-1, 1.3-2 and 1.3-3 (SCC 1-03-004-02/03, 1-02-004-02/03, and 1-03-004-04)

(AP-42 Supplement E 9/98)

Emission (tons/yr) = Throughput (kgals/year) x Emission Factor (lb/kgal)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

No data are available for HAPs emissions calculations

**Appendix A: Emission Calculations
Process Operations**

**Company Name: Mid-States Rubber Products, Inc.
Address City IN Zip: 1230 Race Street, Princeton, Indiana 47670
Part 70: 051-7807
Plt ID: 051-00021
Reviewer: CarrieAnn Ortolani
Date: December 16, 1996**

Emission Unit	Unit ID	Stack	Flow Rate (acfm)	Outlet Grain Loading (gr/acfm)	Controlled PM Emission Rate (lbs/hr)	Controlled PM Emission Rate (tons/yr)	Control Efficiency	Potential PM Emissions (lbs/hr)	Potential PM Emissions (tons/yr)	Process Weight Rate (lbs/hr)	Allowable PM Emissions (lbs/hr)
Mixing Process (U-01 and U-02)	CE-01	S-01	16000	0.02	2.74	12.0	99.0%	274	1201	5300	7.88
					2.74	12.0		274	1201		

Methodology

Controlled Emissions (lbs/hr) = gr/acfm x acfm x 60 minutes/hr / 7000 gr/lb
 Uncontrolled Emissions (lbs/hr) = Controlled Emissions (lbs/hr) / (1 - Control Efficiency)
 Emissions (tons/yr) = Emissions (lbs/hr) * 8760 hrs/yr / 2000 lbs/ton
 Allowable Emissions (lbs/hr) = 4.10 x (Process weight (lbs/hr) / 2000 lbs/ton)^{0.67} [326 IAC 6-3-2]

Other Emissions from Rubber Parts Manufacturing

	Rubber Throughput (lbs/hr)	VOC Emission Factor (lbs/lb rubber)	VOC (lbs/hr)	VOC (tons/yr)	Total HAPs Emission Factor (lbs/lb rubber)	HAPs (lbs/hr)	HAPs (tons/yr)	PM Emission Factor (lbs/lb rubber)	PM (lbs/hr)	PM (tons/yr)
Insignificant Extruding	5300	1.51E-04	0.800	3.51	6.43E-05	0.341	1.49	6.83E-08	0.0004	0.002
Press Curing (U-08)	4000	4.78E-03	19.1	83.7	1.34E-03	5.36	23.5	N/A	N/A	N/A
Mixing and Milling	5300	2.91E-04	1.54	6.76	2.00E-04	1.06	4.64	See above	See above	See above

Emission Factors from Tables 4.12-6, 4.12-8 and 4.12-4 of AP-42 draft Section 4.12
 Emission factors are for the worst case compound used at this source (Natural, butyl, EPDM, EPDM (colors), Neoprene, Nitrile, CPE, SBR and Epichloroglydrin) for each pollutant.

Appendix A: Emission Calculations
HAP Emission Calculations

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Company Name: Mid-States Rubber Products, Inc.
Address City IN Zip: 1230 Race Street, Princeton, Indiana 47670
Part 70: 051-7807
Pit ID: 051-00021
Reviewer: CarrieAnn Otolani
Date: December 16, 1996

Press Curing

HAP	Compound 2 Emission Factor (lb/lb rubber)	Compound 7 Emission Factor (lb/lb rubber)	Compound 8 Emission Factor (lb/lb rubber)	Compound 10 Emission Factor (lb/lb rubber)	Compound 11 Emission Factor (lb/lb rubber)	Compound 14 Emission Factor (lb/lb rubber)	Compound 21 Emission Factor (lb/lb rubber)	Compound 22 Emission Factor (lb/lb rubber)	Compound 23 Emission Factor (lb/lb rubber)	Potential Rubber Throughput (lbs/hr)	Potential Emissions (lbs/hr)	Potential Emissions (tons/yr)
1,1,1 Trichloroethane	2.52E-06	4.19E-06	5.22E-07	2.52E-06		2.05E-06		2.04E-07	4.51E-06	4000	0.018	0.079
1,1, Dichloroethane			1.96E-06							4000	0.008	0.034
1,3 Butadiene	1.20E-05	9.42E-06	2.20E-06	7.43E-06		2.17E-05			6.77E-06	4000	0.087	0.380
1,4 Dichlorobenzene	7.63E-08	5.42E-08		5.53E-8		8.94E-08			8.08E-08	4000	0.0004	0.002
2-Butanone	2.77E-06		9.92E-06				9.24E-06		1.30E-06	4000	0.040	0.174
2-Chloro-1,3-Butadiene					9.08E-06			4.01E-06		4000	0.036	0.159
MIBK			2.48E-06		1.65E-06		5.40E-07			4000	0.010	0.043
Acetaldehyde								4.01E-06		4000	0.016	0.070
Acetophenone	1.39E-06	8.74E-07	2.52E-07	4.36E-07		2.16E-06	3.43E-07	4.01E-06	3.37E-07	4000	0.016	0.070
Acrylonitrile			1.33E-06			3.02E-05				4000	0.121	0.529
Aniline	4.16E-07		1.51E-07		2.46E-07			4.25E-06	2.83E-06	4000	0.017	0.074
Benzene	1.36E-06					1.15E-06				4000	0.005	0.024
Benzidine								2.81E-07		4000	0.001	0.005
bis(2-Ethylhexyl)phthalate	2.48E-06	1.15E-05		2.83E-06	1.67E-06	2.41E-06	2.57E-06	2.67E-06	6.50E-06	4000	0.046	0.201
Carbon Disulfide	5.35E-04		5.48E-04	1.32E-03	3.47E-04	8.67E-04	8.52E-07	1.63E-04	8.64E-06	4000	5.28	23.1
Carbonyl Sulfide	3.65E-05		4.39E-04		6.60E-07	8.80E-05	6.88E-06		2.65E-05	4000	1.76	7.69
Chloroform							3.36E-07			4000	0.001	0.006
Chloromethane			7.31E-07				7.68E-06		1.05E-06	4000	0.031	0.135
Cumene	5.90E-08	7.43E-08	1.89E-06	3.20E-08	3.44E-08	5.08E-08	5.47E-07	9.44E-08	2.24E-08	4000	0.008	0.033
Di-n-butylphthalate	2.11E-06	7.80E-07	1.46E-07	8.30E-08		4.78E-07	5.58E-06	1.35E-07	3.59E-06	4000	0.022	0.098
Dibenzofuran	5.04E-08			2.77E-08		5.70E-08	5.98E-09		4.19E-08	4000	0.0002	0.001
Dimethylphthalate	7.78E-08					6.62E-08		9.87E-08		4000	0.0004	0.002
Ethylbenzene			2.16E-06							4000	0.009	0.038
Hexane	1.03E-05	9.22E-06	2.50E-05	4.12E-06	3.12E-05	6.50E-06	4.95E-06	8.53E-06	4.96E-06	4000	0.125	0.547
Isocotane			4.81E-06				4.14E-06			4000	0.019	0.084
Isophorone							7.69E-08			4000	0.0003	0.001
Xylenes	1.91E-06	4.98E-06	1.15E-05				5.89E-06			4000	0.046	0.202
Methylene Chloride	1.57E-06	1.61E-06	9.40E-06	1.57E-06	2.83E-06	1.54E-06	5.52E-06	2.34E-06	1.60E-06	4000	0.038	0.165
Naphthalene	4.59E-07	2.37E-06	5.32E-07	2.81E-07	1.62E-06	6.12E-07	2.44E-07	3.00E-06	3.71E-07	4000	0.012	0.053
o-Tolidine	1.59E-06									4000	0.006	0.028
Phenol	5.37E-07	4.22E-07	6.23E-07	4.18E-07	4.53E-07	2.67E-06	1.83E-07	5.52E-07	3.96E-07	4000	0.011	0.047
Propylene Oxide	1.04E-04				3.63E-05					4000	0.416	1.82
Styrene			8.06E-07				1.24E-06			4000	0.005	0.022
Tetrachloroethene			1.51E-06							4000	0.006	0.026
t-Butyl Methyl Ether							1.56E-04			4000	0.624	2.73
Toluene	6.20E-06	3.00E-06	2.57E-05	2.76E-06	2.30E-06	3.87E-06	2.69E-06	4.22E-06	5.57E-06	4000	0.103	0.450
Formaldehyde		1.23E-06								4000	0.005	0.022

Mixing and Milling

HAP	Compound 2 Emission Factor (lb/lb rubber)	Compound 7 Emission Factor (lb/lb rubber)	Compound 8 Emission Factor (lb/lb rubber)	Compound 10 Emission Factor (lb/lb rubber)	Compound 11 Emission Factor (lb/lb rubber)	Compound 14 Emission Factor (lb/lb rubber)	Compound 21 Emission Factor (lb/lb rubber)	Compound 22 Emission Factor (lb/lb rubber)	Compound 23 Emission Factor (lb/lb rubber)	Potential Rubber Throughput (lbs/hr)	Potential Emissions (lbs/hr)	Potential Emissions (tons/vr)
1,1,1 Trichloroethane	8.03E-08		2.67E-08	1.34E-07		3.61E-08	1.04E-08	6.55E-08		5300	0.001	0.003
1,1, Dichloroethene			1.00E-07			2.19E-07				5300	0.001	0.005
1,3 Butadiene		4.67E-07	1.13E-07		3.82E-07	2.39E-07		1.31E-07	1.43E-07	5300	0.002	0.011
1,4 Dichlorobenzene		1.82E-09	4.48E-09	5.95E-10	1.50E-09					5300	0.00002	0.0001
2-Butanone	1.59E-06	1.40E-06	5.08E-07	1.18E-06	8.64E-08	3.10E-07	4.73E-07	4.37E-06		5300	0.023	0.101
2-Chloroacetophenone				5.46E-10						5300	0.000003	0.00001
MIBK	1.97E-07		1.27E-07	4.15E-07	6.79E-08	8.26E-07	2.76E-08	2.92E-08	9.02E-09	5300	0.004	0.019
Acetophenone	1.23E-08	1.23E-07	1.29E-08	8.46E-08	2.29E-07	1.70E-08	1.76E-08	2.92E-08	9.02E-09	5300	0.001	0.005
Acrolein						8.26E-07	2.27E-07	3.00E-07		5300	0.004	0.019
Acrylonitrile			6.81E-08			1.17E-05				5300	0.062	0.272
Aniline	4.80E-07		7.70E-09	4.71E-09	2.39E-08			4.68E-07	2.23E-07	5300	0.003	0.011
Benzene	4.62E-08	9.13E-08				5.24E-07		8.87E-08		5300	0.003	0.012
Biphenyl						1.24E-09		9.77E-09		5300	0.0001	0.0002
bis(2-Ethylhexyl)phthalate	3.01E-08	3.34E-08			2.69E-07		1.31E-07	8.41E-09	6.74E-07	5300	0.004	0.016
Cadmium Compounds	2.40E-09	3.89E-09	9.09E-10	4.08E-09	1.27E-09	3.38E-09	6.27E-10	2.79E-09	1.04E-09	5300	0.00002	0.00009
Carbon Disulfide			2.81E-05	1.03E-04	8.64E-06	4.26E-06	4.36E-08	9.56E-08	5.07E-07	5300	0.546	2.391
Carbonyl Sulfide			2.24E-05			1.13E-05	3.52E-07		2.88E-06	5300	0.119	0.520
Chloroform						2.45E-08	1.72E-08			5300	0.0001	0.001
Chloromethane	3.12E-08		3.74E-08	9.27E-08		3.61E-08	3.93E-07	3.82E-08		5300	0.002	0.009
Chromium Compounds	6.99E-09	1.23E-07	4.41E-09	1.58E-08		4.05E-09	1.08E-09	3.81E-09	2.11E-08	5300	0.001	0.003
Cumene		8.31E-08	9.65E-08	8.81E-07	2.68E-09		2.80E-08	5.61E-08	1.99E-09	5300	0.005	0.020
Di-n-butylphthalate	1.61E-08		7.47E-09	1.47E-08		8.95E-09	2.86E-07	3.57E-08	8.78E-08	5300	0.002	0.007
Dibenzofuran	2.11E-09					2.41E-09	3.06E-10		5.31E-10	5300	0.00001	0.00006
Dimethylphthalate						3.00E-09				5300	0.00002	0.00007
Ethylbenzene	1.45E-07	4.32E-06	1.11E-07		6.81E-08	6.12E-08		1.28E-07		5300	0.023	0.100
Hexachloroethane								6.06E-09		5300	0.00003	0.0001
Hexane	1.08E-06	1.08E-05	1.28E-06	1.66E-06	2.84E-07	6.78E-07	2.53E-07	7.75E-07	6.22E-07	5300	0.057	0.251
Isocotane	7.69E-08	2.11E-07	2.46E-07	3.19E-07	7.33E-08	2.60E-07	2.12E-07	7.95E-07		5300	0.004	0.018
Isophorone	6.63E-07						3.93E-09	3.37E-07		5300	0.004	0.015
Lead Compounds	3.24E-10	1.03E-08		8.16E-09	5.51E-10	5.39E-09		4.97E-09		5300	0.0001	0.0002
Xylenes	9.68E-07	2.21E-05	5.90E-07	1.47E-06	2.84E-07	5.06E-07	3.01E-07	7.84E-07	1.18E-07	5300	0.117	0.514
Methylene Chloride	9.51E-07	1.14E-06	4.81E-07	9.04E-06	5.00E-07	1.68E-06	2.82E-07	1.01E-06	1.10E-06	5300	0.048	0.210
Naphthalene	3.33E-08	4.32E-08	2.72E-08	8.18E-09	8.87E-09		1.25E-08	5.52E-08	3.18E-08	5300	0.0003	0.001
Nickel Compounds			3.38E-08	2.40E-08					2.91E-08	5300	0.0002	0.001
Nitrobenzene					2.20E-08					5300	0.0001	0.001
Phenol	4.90E-08	2.39E-08	3.19E-08	1.21E-08	9.20E-09	5.33E-08	9.35E-09	6.87E-07	1.25E-08	5300	0.004	0.016
Propylene Oxide						6.97E-06				5300	0.037	0.162
Styrene			4.12E-08	2.18E-07	5.01E-08	6.50E-08	6.32E-08	1.48E-06		5300	0.008	0.034
Tetrachloroethene	4.10E-06		7.75E-08	1.22E-07	2.41E-08	1.42E-07				5300	0.022	0.095
t-Butyl Methyl Ether							7.98E-06			5300	0.042	0.185
Toluene	2.06E-06	1.05E-06	1.32E-06	1.84E-06	3.92E-07	1.55E-06	1.38E-07	2.47E-06	2.31E-05	5300	0.122	0.536

Emission Factors from Tables 4.12-8 and 4.12 - 4 of AP-42 draft Section 4.12

These calculations are for the maximum potential emissions of each individual HAP considering the compounds used at this source.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Page 9 of 10 TSD App A

Company Name: Mid-States Rubber Products, Inc.
Address City IN Zip: 1230 Race Street, Princeton, Indiana 47670
Part 70: 051-7807
PIt ID: 051-00021
Reviewer: CarrieAnn Ortolani
Date: December 16, 1996

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/hr)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	Lbs VOC/gal solids	Transfer Efficiency
U-06/S-05																
VM&P Naphtha	6.43	100.00%	0.0%	100.0%	0.0%	0.00%	2.50000	600.000	6.43	6.43	16.08	385.80	70.41	0.00	N/A	50%
Xylene	7.36	100.00%	0.0%	100.0%	0.0%	0.00%	2.50000	600.000	7.36	7.36	18.40	441.60	80.59	0.00	N/A	50%
Chemlok 220x	8.17	74.90%	0.0%	74.9%	0.0%	14.80%	2.50000	600.000	6.12	6.12	15.30	367.16	67.01	11.23	41.35	50%
Chemlok 250x	7.93	74.50%	0.0%	74.5%	0.0%	17.50%	2.50000	600.000	5.91	5.91	14.77	354.47	64.69	11.07	33.76	50%
Thixon P-6-3	7.80	93.60%	0.0%	93.6%	0.0%	27.00%	2.50000	600.000	7.30	7.30	18.25	438.05	79.94	2.73	27.04	50%
Toluene	7.27	100.00%	0.0%	100.0%	0.0%	0.00%	2.50000	600.000	7.27	7.27	18.18	436.20	79.61	0.00	N/A	50%
U-07/S-06																
VM&P Naphtha	6.43	100.00%	0.0%	100.0%	0.0%	0.00%	2.50000	600.000	6.43	6.43	16.08	385.80	70.41	0.00	N/A	50%
Xylene	7.36	100.00%	0.0%	100.0%	0.0%	0.00%	2.50000	600.000	7.36	7.36	18.40	441.60	80.59	0.00	N/A	50%
Chemlok 220x	8.17	74.90%	0.0%	74.9%	0.0%	14.80%	2.50000	600.000	6.12	6.12	15.30	367.16	67.01	11.23	41.35	50%
Chemlok 250x	7.93	74.50%	0.0%	74.5%	0.0%	17.50%	2.50000	600.000	5.91	5.91	14.77	354.47	64.69	11.07	33.76	50%
Thixon P-6-3	7.80	93.60%	0.0%	93.6%	0.0%	27.00%	2.50000	600.000	7.30	7.30	18.25	438.05	79.94	2.73	27.04	50%
Toluene	7.27	100.00%	0.0%	100.0%	0.0%	0.00%	2.50000	600.000	7.27	7.27	18.18	436.20	79.61	0.00	N/A	50%

Control Efficiency
90.00%
Uncontrolled
Controlled

36.8
36.8
883
883
161
161
22.5
2.25

State Potential Emissions

Add worst case coating to all solvents

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating for each station + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations
From Surface Coating Operations

Company Name: Mid-States Rubber Products, Inc.
Address City IN Zip: 1230 Race Street, Princeton, Indiana 47670
Part 70: 051-7807
Plt ID: 051-00021
Reviewer: CarrieAnn Ortolani
Date: December 16, 1996

Material	Density (lbs/gal)	Gallons of Material (gal/hr)	Maximum (unit/hr)	Weight % Xylene	Weight % Toluene	Weight % Ethylbenzene	Weight % Lead	Weight % Tetrachloroethylene	Weight % MDI	Weight % MEK	Weight % MIBK	Weight % Epichlorohydrin	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Ethylbenzene Emissions (tons/yr)	Lead Emissions (tons/yr)	Tetrachloroethylene Emissions (tons/yr)	MDI Emissions (tons/yr)	MEK Emissions (tons/yr)	MIBK Emissions (tons/yr)	Epichlorohydrin Emissions (tons/yr)	Total HAPs (tons/yr)
U-06/S-05																						
VM&P Naphtha	6.43	2.50000	600.000	6.00%	5.00%	2.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.22	3.52	1.41	0.00	0.00	0.00	0.00	0.00	0.00	9.15
Xylene	7.36	2.50000	600.000	83.00%	0.00%	17.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	66.89	0.00	13.70	0.00	0.00	0.00	0.00	0.00	0.00	80.59
Chemlok 220x	8.17	2.50000	600.000	65.00%	0.00%	15.00%	2.00%	1.00%	0.00%	0.00%	0.00%	0.00%	58.15	0.00	13.42	1.79	0.89	0.00	0.00	0.00	0.00	74.25
Chemlok 250x	7.93	2.50000	600.000	65.00%	0.00%	15.00%	1.00%	0.00%	1.00%	0.00%	0.00%	0.00%	56.44	0.00	13.03	0.87	0.00	0.87	0.00	0.00	0.00	71.20
Thixon P-6-3	7.80	2.50000	600.000	0.00%	14.60%	0.00%	0.00%	0.00%	0.00%	22.30%	3.70%	0.20%	0.00	12.47	0.00	0.00	0.00	0.00	19.05	3.16	0.17	34.85
Toluene	7.27	2.50000	600.000	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	79.61	0.00	0.00	0.00	0.00	0.00	0.00	0.00	79.61
U-07/S-06																						
VM&P Naphtha	6.43	2.50000	600.000	6.00%	5.00%	2.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.22	3.52	1.41	0.00	0.00	0.00	0.00	0.00	0.00	9.15
Xylene	7.36	2.50000	600.000	83.00%	0.00%	17.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	66.89	0.00	13.70	0.00	0.00	0.00	0.00	0.00	0.00	80.59
Chemlok 220x	8.17	2.50000	600.000	65.00%	0.00%	15.00%	2.00%	1.00%	0.00%	0.00%	0.00%	0.00%	58.15	0.00	13.42	1.79	0.89	0.00	0.00	0.00	0.00	74.25
Chemlok 250x	7.93	2.50000	600.000	65.00%	0.00%	15.00%	1.00%	0.00%	1.00%	0.00%	0.00%	0.00%	56.44	0.00	13.03	0.87	0.00	0.87	0.00	0.00	0.00	71.20
Thixon P-6-3	7.80	2.50000	600.000	0.00%	14.60%	0.00%	0.00%	0.00%	0.00%	22.30%	3.70%	0.20%	0.00	12.47	0.00	0.00	0.00	0.00	19.05	3.16	0.17	34.85
Toluene	7.27	2.50000	600.000	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	79.61	0.00	0.00	0.00	0.00	0.00	0.00	0.00	79.61
Total State Potential Emissions													134	159	27.4	3.58	1.79	1.74	38.1	6.32	0.342	161

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
Total = Worst Coating for each station + Sum of all solvents used